

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF CALIFORNIA;  
COMMONWEALTH OF  
MASSACHUSETTS; STATE OF NEW  
JERSEY; STATE OF COLORADO; STATE  
OF ILLINOIS; STATE OF MARYLAND;  
STATE OF NEW YORK; and STATE OF  
WISCONSIN,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION;  
DENISE CARTER, in her official capacity  
as former Acting Secretary of Education and  
current acting Chief Operating Officer,  
Federal Student Aid; LINDA MCMAHON,  
in her official capacity as Secretary of  
Education,

Defendants.

Case No. 1:25-cv-10548

**[PROPOSED] TEMPORARY RESTRAINING ORDER**

This matter comes before the Court on Plaintiffs Massachusetts, California, New Jersey, Colorado, Illinois, Maryland, New York, and Wisconsin (collectively, “Plaintiff States”) Motion for a Temporary Restraining Order. Having reviewed Plaintiff States’ Complaint and Memorandum of Law, all Declarations and evidence in support of the Motion, as well as any papers filed in opposition to this motion, and in accordance with Federal Rule of Civil Procedure 65, and for good cause shown, the Court finds that Plaintiff States have satisfied the requirements for the issuance of a temporary restraining order because: (1) Plaintiff States have established a substantial likelihood of success on the merits; (2) Plaintiff States will be irreparably harmed absent a temporary restraining order; and (3) the public interest and balance of the equities strongly favor entry of a temporary restraining order.

It is therefore ORDERED that:

- i. Defendants shall immediately restore Plaintiffs to the pre-existing status quo prior to the termination under all previously-awarded TQP or SEED grants for recipients in Plaintiff States;
- ii. Defendants are temporarily and preliminarily enjoined from implementing, giving effect to, maintaining, or reinstating under a different name the termination of any previously-awarded TQP or SEED grants for recipients in Plaintiff States, including but not limited to through the Termination Letter, Termination GAN, and any other agency actions implementing such terminations, such as suspension or withholding of any funds approved and obligated for the grants;
- iii. Defendants are temporarily and preliminarily enjoined from terminating any individual TQP and SEED grant for recipients in Plaintiff States, except to the extent the final agency action is consistent with the Congressional authorization and appropriations, relevant federal statute, including the requirements of the APA, the requirements of the relevant implementing regulations, the grant terms and conditions, and this Court's order;
- iv. Defendants shall file a status report with the Court within 24 hours of entry of a temporary restraining order confirming their compliance with the Court's temporary restraining order; and
- v. Defendants shall provide notice of the temporary restraining order within 24 hours of entry to all defendants, their employees and anyone acting in concert with them, and to all TQP and SEED grantees in Plaintiff States.
- vi. This Temporary Restraining Order shall become effective immediately upon entry by this Court. It shall remain in effect until further order of this Court.

**SO ORDERED.**

Dated: \_\_\_\_\_

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Hon.  
United States District Judge